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FIRST CIRCUIT COURT
STATE OF HAWAII
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F. OTAKE
CLERK

Attorneys for Plaintiffs
Kelley Woodruff, M.D. and
Hawaii Children's Blood and Cancer Group

IN THE CIRCUIT COURT OF THE FIRST CIRCUIT

STATE OF HAWAII

KELLEY WOODRUFF, M.D. and) Civil No. 02-1-0090-01 (BIA)
HAWAII CHILDREN'S BLOOD AND) (Other Civil Action)
CANCER GROUP,)
) PLAINTIFFS' NOTICE OF TAKING
Plaintiffs,) DEPOSITIONS UPON ORAL
vs.) EXAMINATION; CERTIFICATE OF
) SERVICE
HAWAII PACIFIC HEALTH;)
KAPI'OLANI MEDICAL SPECIALISTS;) [Deponents: C. Sted, P. Courtney; C. Kotsubo,
KAPI'OLANI MEDICAL CENTER FOR) R. Robel, D Langaon, F Hallonquist, L.
WOMEN AND CHILDREN; ROGER) O'Brien]
DRUE; FRANCES A. HALLONQUIST;)
NEAL WINN, M.D.; SHERREL)
HAMMAR, M.D.; DELOITTE &)
TOUCHE LLP; DENNIS M. WARREN,) JUDGE: The Honorable Bert I. Ayabe
ESQ.; JOHN DOES 1-99; JANE DOES 1-)
99; DOE ENTITIES 1-20; AND DOE) Trial Date: June 5, 2006
GOVERNMENTAL UNITS 1-10,)
)
Defendants.)
)

PLAINTIFFS' NOTICE OF TAKING DEPOSITIONS UPON ORAL EXAMINATION

TO: KENNETH S. ROBBINS, ESQ.
LEIGHTON HARA, ESQ.
Robbins & Associates

EXHIBIT A

2200 Davies Pacific Center
841 Bishop Street
Honolulu, Hawai'i 96813

Attorneys for Defendants Hawai'i Pacific Health, Kapi'olani
Medical Specialists, Kapi'olani Medical Center for Women and
Children, Roger Drue, Frances A. Hallonquist, Neal Winn, M.D.,
and Sherrel Hammar, M.D.

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KAREN ARIKAWA, ESQ.
23rd Floor, First Hawaiian Center
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Honolulu, Hawai'i 96813

Attorneys for Deloitte & Touche LLP

PLEASE TAKE NOTICE that PLAINTIFFS Kelley Woodruff, M.D. and Hawaii
Children's Blood and Cancer Group, by and through their attorneys, Jouxson-Meyers & del
Castillo, will take the oral depositions of the persons listed below, on the dates and times
indicated below at the offices of Robbins & Associates, Davies Pacific Center, Suite 2200, 841
Bishop Street, Honolulu, Hawai'i 96813:

Name and Address of Deponent

Date and Time

Charles Sted	December 1, 2005 at 9:00 a.m.
Pam Courtney	December 7, 2005 at 9:00 a.m.
Carol Kotsubo	December 14, 2005 at 9:00 a.m.
Richard Robel	December 15, 2005 at 9:00 a.m.
Dew Anne Langcaon	December 20, 2005 at 9:00 a.m.

Name and Address of Deponent
Frances A. Hallonquist

Lawrence O'Brien

Date and Time

December 22, 2005 at 9:00 a.m.

January 7, 2006 at 9:00 a.m.

The depositions shall be upon oral examination and will be taken before a notary public or other officer authorized to administer oaths, from the office of Ralph Rosenberg Court Reporters, pursuant to Rule 28(a) and Rule 30 of the Hawai'i Rules of Civil Procedure. Said deposition may be used for all purposes permitted under the Hawaii Rules of Civil Procedure and the Federal Rules of Civil Procedure. The deposition will continue from day to day until completed. You are invited to attend and cross-examine.

DATED: Honolulu, Hawai'i, November 28, 2005



ARLEEN D. JOUXSON-MEYERS
RAFAEL G. DEL CASTILLO

Attorneys for Plaintiffs
Kelley Woodruff, M.D. and
Hawaii Children's Blood and Cancer Group

IN THE CIRCUIT COURT OF THE FIRST CIRCUIT

STATE OF HAWAII

KELLEY WOODRUFF, M.D. and
HAWAII CHILDREN'S BLOOD AND
CANCER GROUP,

Plaintiffs,

vs.

HAWAII PACIFIC HEALTH;
KAPI'OLANI MEDICAL SPECIALISTS;
KAPI'OLANI MEDICAL CENTER FOR
WOMEN AND CHILDREN; ROGER
DRUE; FRANCES A. HALLONQUIST;
NEAL WINN, M.D.; SHERREL
HAMMAR, M.D.; DELOITTE &
TOUCHE LLP; DENNIS M. WARREN,
ESQ.; JOHN DOES 1-99; JANE DOES 1-
99; DOE ENTITIES 1-20; AND DOE
GOVERNMENTAL UNITS 1-10,

Defendants.

☐ Civil No. 02-1-0090-01 (BIA)
☐ (Other Civil Action)

CERTIFICATE OF SERVICE

[Notice of Depositions: C. Sted, P. Courtney;
C. Kotsubo, R. Robel, D Langaon, F.
Hallonquist, L. O'Brien]

JUDGE: The Honorable Bert I. Ayabe

Trial Date: June 5, 2006

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was duly served upon the above-identified parties at the addresses shown as follows:

TO: KENNETH S. ROBBINS, ESQ. ☒ hand delivery () 1st class mail
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Attorneys for Defendants Hawai'i Pacific Health, Kapi'olani Medical Specialists, Kapi'olani Medical Center for Women and Children, Roger Drue, Frances A. Hallonquist, Neal Winn, M.D., and Sherrel Hammar, M.D.

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Attorneys for Deloitte & Touche LLP

DATED: Honolulu, Hawai'i, November 28, 2005



ARLEEN D. JOUXSON
RAFAEL G. DEL CASTILLO

Attorneys for Plaintiffs
KELLEY WOODRUFF, M.D.
HAWAII CHILDREN'S BLOOD AND CANCER GROUP